Mr. Richard L. Coats Sandia National Laboratories P. O. Box 5800 – MS1141 Albuquerque, New Mexico 87175-0100

Dear Mr. Coats:

Re: Interpretation Request Regarding Depleted Uranium Shielded Shipping Containers and DOE-STD-1027

You requested, via e-mail, an interpretation of DOE-STD-1027 dealing with the following:

Background:

Sandia has on hand 32 20WC-2 and CI-20WC-2A Type B shipping packages that are used for the shipment of Mo-99. These are DOE/NRC approved packages covered under NRC Certificate of Compliance #9098 Revision 8. The containers consist of a steel product container enclosed by a stainless steel sheathed annulus of depleted uranium, in turn surrounded by a wood overpack, contained in a 30-gallon steel drum. The containers have been subjected to drop and fire tests with no detectable damage to the inner steel container or the sheathing of the depleted uranium. A new SARP is currently under review by NRC and the current Certificate of Compliance remains active.

Issue:

In Attachment 1 of DOE-STD-1027-92, Change Notice No. 1, September 1997, it is stated that material contained in DOT Type B shipping containers may also be excluded from the summation of a facility's radioactive inventory if the Certificates of Compliance are kept current and the materials stored are authorized by the Certificate. Can the depleted uranium (as well as any Mo-99 contained in the shipping containers) be excluded from the facility's inventory under the situation as described in the preceding paragraph?

Response:

Yes, in the case of the 20 WC-2 and 20 WC-2A Type B shipping packages, the testing and certification provide evidence that the depleted uranium shielding and the shipping contents will survive the environments for which the shipping package was designed. Therefore, the depleted uranium in the 20 WC-2 and 20 WC-2A containers may be excluded from a facility's inventory, for the purpose of preliminary categorization.

Sincerely,

Richard L. Black, Director Office of Nuclear Safety Policy and Standards

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